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IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

JORGE PEREZ,

Defendant.

CASE NO. 1:21-CR-00113-JLT-SKO

STIPULATION TO VACATE TRIAL AND SET
CASE FOR CHANGE OF PLEA HEARING AND
ORDER THEREON

Date: January 23, 2024

Time: 8:30 a.m.

Honorable Jennifer L. Thurston

STIPULATION

Plaintiff United States of America, by and through its counsel of record, and defendant, by and through defendant's counsel of record, hereby stipulate as follows:

1. By previous order this case was set for a trial on January 23, 2024, at 8:30 a.m. before the Hon. Jennifer L. Thurston. The parties hereby agree to vacate the trial as to Jorge Perez, and set the case for a change of plea hearing on January 22, 2024, at 10:00 a.m. before Hon. Jennifer L. Thurston.
2. Defense counsel requires additional time to meet with his client, review the discovery, work on a resolution of the case, and prepare for the change of plea hearing.
3. The proposed change of plea date represents the earliest date that all counsel are available for the change of plea, taking into account work that defense counsel needs to complete on the case, counsels' schedules, and the need for preparation in the case and further investigation.
4. Although no exclusion of time is necessary because time has already been excluded beyond the change of plea hearing date, an ends-of-justice delay is particularly apt in this case

1 because the defendant is currently out on pretrial release.

2 IT IS SO STIPULATED.

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4 Dated: October 13, 2023

PHILLIP A. TALBERT
United States Attorney

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6 By: /s/ JUSTIN J. GILIO
JUSTIN J. GILIO
Assistant United States Attorney

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8 Dated: October 13, 2023

/s/ Nicholas Reyes
Attorney for Defendant
Jorge Perez

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11 **ORDER**

12 IT IS HEREBY ORDERED that the trial in this case be VACATED as to Jorge Perez and the
13 case is set for a change of plea hearing on January 22, 2024, at 10:00 a.m. before the Hon. Jennifer L.
14 Thurston.

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16 IT IS SO ORDERED.

17 Dated: **October 16, 2023**


UNITED STATES DISTRICT JUDGE